

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** §  
§  
**RIC (LAVERNIA) LLC,** § **Case No. 24-51195-mmp**  
§  
**Debtor** § **Chapter 11**  
§

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**RIC (LAVERNIA) LLC'S AND TIG ROMSPEN US MASTER MORTGAGE LP'S  
EXHIBIT AND WITNESS LIST FOR JUNE 2, 2025 HEARING**

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RIC (Lavernia) LLC, debtor and debtor-in-possession in the above-captioned chapter 11 case (“*Debtor*”), and TIG Romspen US Master Mortgage LP (“*TIG Romspen*”) intend to introduce the following exhibits and call the following witnesses in connection with the matters set for evidentiary hearing on June 2, 2025, beginning at 2:00 p.m. Central Time. Debtor and TIG Romspen reserve the right to supplement this Exhibit and Witness List prior to the hearing.

The matters set for evidentiary hearing are:

- *Debtor's Motion to Strike OTISCO's Objection* [Main Bankruptcy<sup>1</sup> Dkt. 83]; and
- *Defendants' Motion to Dismiss or, in the alternative, Motion for Summary Judgment* [OTISCO Adversary<sup>2</sup> Dkt. 4]

**EXHIBITS:** In addition to any exhibit designated by any other party in interest to this matter, any exhibit for impeachment purposes or to lay foundation, or any exhibit for rebuttal purposes, Debtor and TIG Romspen identify the following exhibits they will or may offer as evidence at the hearing:

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<sup>1</sup> “Main Bankruptcy Dkt.” refers to the docket entries in Case No. 24-51195-mmp.

<sup>2</sup> “OTISCO Adversary Dkt.” refers to the docket entries in Adversary No. 25-05040-mmp.

No.	Description	Stipulated Admitted Prior to Hearing	Objection	Admitted
A	Appointment of Substitute Trustees, recorded on Jan. 3, 2024, as Instrument Number 139036 in the Wilson County Public Records			
B	Deed of Trust, Assignment of Leases and Rents, Security Agreement and Fixture Filing given by OTISCO RDX, LLC, in favor of TIG ROMSPEN US MASTER MORTGAGE LP, recorded on Aug. 22, 2023, as Instrument No. 135641 in the Wilson County Public Records			
C	Letter dated Jan. 16, 2024, from Kyle Hirsch re: Notice of Foreclosure Sale with Enclosures			
D	Substitute Trustee's Deed and Bill of Sale, recorded on Mar. 26, 2024, as Instrument No. 141143 in the Wilson County Public Records			
E	Debtor's Schedules of Assets and Liabilities [Main Bankruptcy Dkt. 20]			
F	Debtor's Amended Schedule A/B [Main Bankruptcy Dkt. 28]			
G	Debtor's Amended Bankruptcy Petition [Main Bankruptcy Dkt. 12]			

**WITNESSES:** Debtor and TIG Romspen may call as a witness any witness designated by any other party in interest to this matter, any witness necessary for impeachment purposes or to lay foundation, and any witness called for rebuttal purposes

Dated: May 28, 2025

Respectfully submitted,

**BRYAN CAVE LEIGHTON PAISNER LLP**

/s/ R. Luke Graham

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***Attorneys for RIC (Lavernia) LLC and TIG  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 28, 2025, the foregoing was served via the Court's CM/ ECF system on all parties authorized to receive electronic notice in this case, including the following counsel:

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*Attorney for Creditor Propel Financial Services as agent and attorney in fact for  
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/s/ R. Luke Graham

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